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P.G. INVESTMENT CORPORATION
620 ST. CYR ROAD
ST. LOUIS, MISSOURI 63137

July 19, 1993

Site: <u>Moline Creek</u>
ID # <u>MO D980631162</u>
Block: <u>116</u>
Other: <u>P.G. Investment</u>
<u>6-19-93</u>

TO: U. S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Missouri 66101

ATTN: DAVID A. HOEFER, ASSISTANT REGIONAL COUNSEL

RE: Information Request Dated May 18, 1993
Letter Extending Response Time To 7-21-93
P.G. Investment Corporation
c/o Mark Z. Schraier, Registered Agent
168 North Meramec, Suite 400
St. Louis, Missouri 63105
Former Certainteed Corporation Site
600 St. Cyr Road
St. Louis, Missouri 63137

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Dear Mr. Hoefer:

In response to your "Request for Information" we submit the following information and comments.

QUESTION 1

Identify all persons consulted, and all documents reviewed in the preparation of responses to this Information Request.

ANSWER 1

(a) Phillip Kootman, Gerald Kootman and counsel for The Company.

(i) Phillip and/or Gerald Kootman
P.G. Investment Corporation
620 St. Cyr Road
St. Louis, Missouri 63137

(b) Documents reviewed were those contained in business files of P.G. Investment Corporation relating to the purchase of the property and the abatement activity concurrent with the acquisition. Also reviewed were documents relating to the acquisition of the property entitled "The Industrial Development Authority of the County of St. Louis, Missouri 1980 Industrial

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Development Revenue Bond (Branch Metal Facility)". Business files for Asbestos Survey and removal work in 1992 and 1993 were also reviewed.

QUESTION 2

Identify all persons, including Respondent's employees, who have knowledge, information or documents pertaining to generation, use, treatment, storage, disposal or other handling of hazardous substances at the Site.

ANSWER 2

All asbestos generation, use, treatment, storage, disposal, etc., prior to the purchase of the site in 1980 by Respondent, was in the control of Certainteed Corporation. Respondent has no knowledge of specifically named Certainteed employees responsible for such activity. The only exception are names of Certainteed employees which appear on the Sale Contract and other documents furnished to Respondent by Certainteed during the time prior to and subsequent to the purchase.

The property was purchased by Respondent for the operation of a business known as Branch Metals and for other redevelopment purposes.

Branch Metals was owned by the Principals of Respondent and subsequently sold to relatives of the Principals upon their retirement.

Branch Metals was in the business of buying and re-selling ferrous and non-ferrous metal as scrap or otherwise, and did not handle any asbestos containing materials.

Respondent also has leased space (not occupied by Branch Metals) to multi-tenants. To the best of Respondents knowledge and belief, no tenant was involved in any generation, processing, storage, treatment, disposal or other handling of asbestos or asbestos containing materials.

QUESTION 3

Describe the nature of your activities as the Site, particularly with respect to the processing, storage, treatment, disposal, or other handling of asbestos or asbestos containing material ("ACM").

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ANSWER 3

None. Other than the cleanup work at the time of purchase, and subsequent cleanup work in 1992-1993. Other than these activities, Respondent had no activities at the Site relating to ACM. The Site was purchased to operate Branch Metals, and redevelop as industrial and transportation space for rental tenants.

QUESTION 4

Identify who you acquired the Site from. In addition, identify the time periods during which you operated and/or owned the Site.

ANSWER 4

See Answer 1. Site (600 St. Cyr Road, St. Louis, Missouri 63137). The Site was never "operated" by Respondent except for its collateral business as Branch Metals, and for redevelopment and leasing activities as set out above. Branch Metals was sold by the Principals of Respondent in January of 1990. Respondent has owned the property from 1980 to date.

QUESTION 5

Identify any persons who operated at the Site during the time that you owned the Site. In addition, identify the activities they conducted at the Site, the time periods they operated at the Site, and the interest they held in the Site during the periods of operations.

ANSWER 5

From the time of Respondent's purchase of the property, various Tenants operated their businesses at the Site. Respondent's records are not clear on all exact dates but the following list identifies all Tenants from the date of purchase to present date:

Branch Metal Processing Corp. (Processing and storage of
scrap industrial metal,
trucks, trailers and boxes.)

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Rail Container Services	(Storage and repair of overseas containers, chassis and tractors.)
Gateway Container Corp.	(Storage and repair of overseas containers, chassis and tractors.)
B & R Trucking	(Transporting of containers and trailers - parking of tractors and trailers.)
MNX Transportation	(Truck brokerage.)
St. Louis Piggyback	(Transporting of containers and trailers - parking of tractors and trailers.)
Commercial Truck Wash	(Parked trucks while not in use - washes commercial trucks and trailers.)
A & P Leasing	(Division of Gateway Container and B & R Trucking - Leased space to MNX.)
P. A. R. Truck Repair	(Repaired tractors, trailers, etc.)
Binkley Mfg.	(Stored trailer chassis and parts)
Finninger's	(Stored tables and equipment for catering.)
J. R. Steel	(Steel Fabricators.)

QUESTION 6

Identify all solid waste units (e.g., waste piles and landfills) located at the Site during the period that you owned/operated the Site. For each unit identified, provide the following information:

- (a) The type and dimensions of the unit;
- (b) The dates that the unit was in use;

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- (c) The quantity and types of materials placed in the unit;
- (d) The construction of the unit;
- (e) How the unit was closed and what actions were taken to prevent or address potential or actual releases of asbestos or ACM from the unit; and
- (f) If available, provide a map showing the unit's boundaries and the location of all known solid waste units.

ANSWER 6

(a) At the time of purchase by Respondents, the only units disclosed were the units "Secured Asbestos Cement Piles" as shown on the Plat attached hereto. The shape and dimensions of the "Piles" are shown on the Plat. The Plat was furnished by Certainteed Corporation at the time of purchase. No other locations of buried or covered material were disclosed to Respondent.

(b) Unknown to Respondent. All information concerning this item, to the best of Respondent's knowledge and belief, is in the possession of Certainteed Corporation. The "Pile" was generated, maintained and closed by Certainteed Corporation prior to the purchase by Respondent. Some ACM was removed by Respondent in 1993 when Respondent was advised to remove same (See attachments). See also, Answer 2 above.

(c) Same as Answer 6(b) above.

(d) Same as Answer 6(b) above.

(e) All documents concerning the Site and given to Respondent at the time of purchase are attached hereto. All other information relative to the specific requests in this question would have to be requested from Certainteed Corporation.

QUESTION 7

At the time that you acquired the Site, did you know or have reason to know that any hazardous substance was located at, or disposed of on the Site? Describe all investigations of the Site you undertook prior to acquiring the Site and all of the facts on which you base the answer to this question.

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ANSWER 7

Yes. Certainteed disclosed the existence of the Secured Asbestos Cement Piles prior to purchase. A Plat of their locations was given to Respondent. Respondent's Environmental Consultant advised on environmental matters to be corrected at the time of purchase. All cleanup work was based on those recommendations. No concern for the Secured Asbestos Cement Piles was raised. Copies of all requests, documentation, correspondence, etc. are attached hereto. No other information was given to Respondent by Certainteed as to any other buried material at the Site, other than that represented by the Secured Asbestos Cement Piles.

QUESTION 8

Have you at any time since you acquired the Site performed any investigations of the soil, water (ground or surface), geology, hydrology, or air quality on or about the Site? If so, what were the results? Provide copies of all reports, etc., pertaining to such investigations.

ANSWER 8

An asbestos survey cleanup was performed for Respondent in 1992-1993, by Geotechnology of St. Louis, to quantify and remove ACM from the Site (copies of proposals and related material are attached). Air sampling was performed by Branch Metals at their facility for OSHA compliance (copies attached). No other investigation of soil water (ground or surface) geology or hydrology have been performed by Respondent.

QUESTION 9

Have you at any time performed any removal or remedial activities with regard to hazardous substances at the Site? If so, provide copies of all documents, reports, etc., pertaining to such activities.

ANSWER 9

See Answer 8 above, copies are attached.

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QUESTION 10

Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of asbestos or ACM at or from the Site.

ANSWER 10

To the best of Respondent's knowledge and belief, none.

QUESTION 11

If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

ANSWER 11

Certainteed Corporation and its consultants.

- (i) Geotechnolocy
2258 Grissom
St. Louis, Missouri 63146
- (ii) Precision Analysis, Inc.
1030 Acron Trail
St. Louis, Missouri 63031
- (iii) ATC Environmental, Inc.
7937 Clayton Road
St. Louis, Missouri 63117

QUESTION 12

For every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.

ANSWER 12

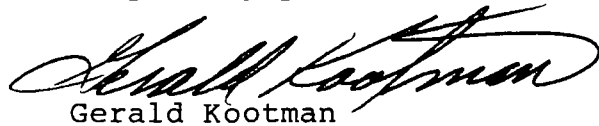
See Answer 11 above. All other relevant documents to this

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Information Request, contained in the files identified in Answer
1, are attached hereto.

If you have any questions, please do not hesitate to contact
us.

Very truly yours,


Gerald Kootman